Gulfco Marine Maintenance Site
Intracoastal Waterway Fish Ingestion Pathway Human Health Baseline Risk Assessment

Comments:

1. (Receptors and Exposure pathways, p. 5): The text characterizes the site as small with a lack of habitat and prey items within the site Intracoastal Waterway shoreline. It also mentions the large home ranges of most sport fish and concludes that chemicals measured in the fish caught near the site are unlikely attributable to the site. A description of the habitat, the type and prevalence of prey species and the home ranges of fish are not provided. A number of fish and crab samples, 29, were caught in the barge slips adjacent to the site, as well as a number of non-target species. Also, the background fish samples were not analyzed, and therefore that data is not available for comparison to the samples caught near the site. These discussions include a number of unsupported conclusions (i.e., small site size, lack of habitat, lack of prey, large home ranges, and chemicals unlikely attributable to the site) and shall be deleted, or, as an alternative, each conclusion shall be supported and documented. Further, any characterization regarding the relevance of the site to fish impacts shall be supported with the background results.

2. (Toxicity Assessment, p. 8): In the second paragraph of this section, the discussion about simplistic risk assessment assumptions not being true for many responses, and future changes in the risk assessment process shall be deleted. This discussion is not relevant to the site or the fish risk assessment, which shall follow the current guidance.

3. (Noncarcinogenic Hazards, p. 10): The last sentence of the first paragraph on page 10 states that noncarcinogenic risks for some chemicals may not necessarily be manifested unless the hazard index exceeds 10 or 100. The basis for this conclusion is not provided, nor is it shown how it is relevant to conditions and chemicals at the Gulfco site. In the next paragraph, the text states that a hazard index of one indicates the need for further evaluation. In fact, a hazard index greater than one indicates that there is a risk of adverse noncarcinogenic effects. These sentences shall be deleted.

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